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December 5, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Written *Ex Parte* Presentation**

IB Docket No. 13-213; Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks

Dear Ms. Dortch:

On November 22, 2016, Wi-Fi Alliance wrote that it was encouraged by the letter that Globalstar, Inc. ("Globalstar") submitted in the above referenced proceeding on November 9, 2016, which would reform its proposal for providing a Terrestrial Low Power Service ("TLPS").^{1/} Nevertheless, Wi-Fi Alliance asked that the Commission ensure that Globalstar does not "bond" or "aggregate" its spectrum with frequencies below 2483.5 MHz in an attempt to provide a combined ATC/Part 15 service. Wi-Fi Alliance pointed out that allowing bonded or aggregated service will eliminate the beneficial components of Globalstar's proposal and effectively permit the provision of service in a way to which Wi-Fi Alliance and others objected.

In order to provide the Commission with more particular guidance on this issue, Wi-Fi Alliance suggests that the following wording be added as Section 25.149(c)(4)(vii):

(vii) Any equipment (access point and end user devices) that also operates with spectrum other than the band 2483.5-2495 MHz, must demonstrate compliance with the rules governing the use of such spectrum, as if the equipment operates with the spectrum independently of the band 2483.5-2495 MHz, irrespective of whether licensees operating in the 2483.5-2500 MHz consent or desire to receive higher-power emissions.

NOTE to 25.149(c)(4)(vii): Without limiting the foregoing, any such devices that operate in spectrum permitted for use in unlicensed devices pursuant to Part 15 of these rules must comply with, among others, Sections 15.205, 15.209, and 15.249 when using spectrum permitted for use under Part 15.

^{1/} Letter from Edgar Figueroa, President and CEO, Wi-Fi Alliance, to Marlene H. Dortch, Sec'y, FCC, IB Docket No. 13-213 (filed Nov. 22, 2016), responding to Letter from L. Barbee Ponder, Gen. Counsel and Vice President of Regulatory Affairs, Globalstar to Marlene H. Dortch, Sec'y, FCC. IB Docket No. 13-213 (filed Nov. 9, 2015).

This change, and the others suggested in Wi-Fi Alliance's previous correspondence (a re-titling of Section 25.149(g) of the rules and a submission by Globalstar of the precise rules it believes the Commission should adopt) will ameliorate many of the remaining concerns of Wi-Fi Alliance and may address some concerns from others, regarding TLPS.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter has been submitted in the record of this proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Edgar Figueroa', with a long horizontal flourish extending to the right.

WI-FI ALLIANCE

Edgar Figueroa
President and CEO

efigueroa@wi-fi.org